

# EXHIBIT I

STATE OF MICHIGAN Washtenaw County 15 <sup>th</sup> Dist. Court	<b>AFFIDAVIT FOR SEARCH WARRANT</b>	Case No. Do99PD 1890303861
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Affiant: Detective Ryan A Cavanaugh      Complaint/Report number:      UMPD 1890303861

1. The person, place or thing to be searched is described as and is located at:

The items to be searched are located at 1301 North Hagadorn Rd, East Lansing, Michigan. This location is the office building for The Doctor Company Malpractice Insurance. This building is a multi-level office building, black and grey in color with the main entrance on the North side of the building.

2. The property to be searched for and seized, if found is specifically described as:

Any and all written and/or electronic records relating to any claims against and/or claim history reports for Robert E. Anderson MD. [REDACTED] from January 1, 1968 through January 2, 2003

3. The FACTS establishing probable cause or the grounds for the search are:

A. Affiant is currently assigned to the CIU division as a detective with the University of Michigan Police Department. Affiant has over 20 years of law enforcement experience with the Washtenaw County Sheriff Department and University of Michigan PD.

B. Affiant has conducted numerous investigations including narcotics sales, firearm violations, CSC, death investigations, larcenies, identity theft/fraud, and participated in numerous high risk search warrants as a member of the Washtenaw County Sheriff SWAT Team.

C. Affiant is currently investigating a criminal sexual assault case that was reported to University of Michigan Athletic Director Warde Manuel in July 2018. Det. West informed Affiant that the report to Manuel came in a letter that was mailed from a former University of Michigan wrestler named [REDACTED]

D. OIE Director Pam Heatlie told Det. West who then informed Affiant that the University of Michigan Athletic Department delivered the letter to an unknown person at the University of Michigan's General Counsel's Office. The letter was then routed to the Office of Institutional Equity Director Pam Heatlie in July 2018. On October 3, 2018 Detective Mark West received the letter from Heatlie and a criminal investigation was started.

E. Det. West told Affiant that he did a telephone interview [REDACTED] who confirmed he was the author of the letter sent to Warde Manuel. [REDACTED] reported concerns regarding medical procedures done by Dr. Robert Anderson back in 1972-1976. [REDACTED] sought treatment due to cold sores and herpes on his face, which is a common injury for wrestlers. At the time [REDACTED] was 17 and when Dr. Anderson conducted a hernia and prostate exam [REDACTED] didn't think to ask any questions at the time. [REDACTED] reported that Dr. Anderson had the nickname of "Dr. Drop Your Drawers." Furthermore, [REDACTED] stated that there are additional victims.

F. Det. West told Affiant that on October 16, 2018 Det. West received information from Pam Bacon who works for the Michigan Licensing and Regulatory Administration (LARA) regarding a complaint filed by a former University of Michigan student against Dr. Anderson. That complaint was filed in 1994.

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<p>This Affidavit consists of <u>2</u> pages.</p> <p>Reviewed on <u>11/15/2018</u> Date</p> <p>By <u>Konrad Siller P43982</u> Prosecuting Attorney</p>	<p><u>SA [Signature]</u> Affiant - Detective Ryan A Cavanaugh</p> <p>Subscribed and sworn to before me on <u>11/15/18</u> at <u>10:24</u> Date</p> <p>Judge/Magistrate <u>Mag. Tamara A. Gerwood, P59488</u></p>
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G. Det. West and Affiant spoke with Thomas Easthope on or about November 2, 2018 who was the associate director of student life at the University of Michigan back in the late 70's and early 80's for additional information. When asked about Dr. Anderson, Easthope referred to him as "Dr. Drop Your Drawers."

H. Easthope told Affiant and West the following. In late 1978 or 1979, Easthope received information from [REDACTED] at Dr. Anderson was "fooling around with male students and athletes" in the examination rooms. At that time, Dr. Anderson was the Director of Health Services located on Fletcher Ave. Easthope remembers that day, like it was yesterday. Easthope was a young associate director and had to go fire the Director of Health Services. Easthope confronted Dr. Anderson on the allegations. Dr. Anderson never answered. Easthope told Dr. Anderson "you got to go" for the inappropriate conduct.

I. Easthope originally stated that he fired Dr. Anderson on the spot. A few minutes later, reported that he may have let Dr. Anderson resign and return to private practice. Whichever one it was, Easthope stated that Dr. Anderson was gone and couldn't hurt anymore students.

J. Det. West informed Easthope that Dr. Anderson continued to work at the University in multiple capacities until 2003. Easthope was visibly upset. Easthope thought Dr. Anderson was gone, gone for good. Easthope reported that we(the police) may have over 100 victims.

K. Det. West informed Affiant that he has made contact with multiple victims that have reported they were sexually assaulted by Dr. Anderson as a student and/or athlete at the University of Michigan during the timeframe of 1972-1996.

L. On November 2, 2018 Affiant began to review Dr. Anderson's human resource/personnel file as an investigative tool. Dr. Anderson's employment started in 1968 until January 2, 2003 when he retired. Dr. Anderson had multiple titles during his career from Director of Health Services, Clinical instructor urology/surgery, and Athletic Senior Physician to name a few.

M. While reviewing the personnel file Affiant located one piece of paper that is consistent with Easthope's statement. In Aug. 1979 Dr. Anderson was demoted from Director of Health Services effective January 14, 1980. The reason for the demotion was typed in as "resuming former position."

N. Furthermore, Affiant located a medical malpractice insurance policy from Michigan Physicians Mutual Liability Company (MPMLC) dated 4/08/95 to 4/08/96. This date is approx. 12 months later than the LARA complaint filed in 1994. Affiant learned that MPMLC was purchased by The Doctors Company insurance out of Napa, California with a resident agent office in East Lansing, Michigan.

O. Affiant spoke with The Doctors Company supervisor Michelle Armstrong on November 13, 2018 and confirmed they now have Dr. Anderson's medical malpractice insurance records from MPMLC. When asked about a claim history report, Armstrong reported that there are "old files" regarding previous claims.

P. With the information received from Det. West, interviews conducted, and additional victims of sexual assaults, Affiant believes that the records held by The Doctors Company may have additional victim information and possible evidence pertaining to criminal activity relating to the willful neglect of duty for a public officer or person holding public employment.

Q. Further, the Affiant sayeth not.

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1. The person, place or thing to be searched is described as and is located at:  
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IN THE NAME OF THE PEOPLE OF THE STATE OF MICHIGAN: I have found that probable cause exists and that you are commanded to make the search and seize the described property. Leave a copy of this warrant and a tabulation (a written inventory) of all property taken with the person from whom the property was taken or at the premises. You are further commanded to promptly return this warrant and tabulation to the court.

Judge/Magistrate

## RETURN AND TABULATION

continued on reverse side

7/14  
3/13